

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

In re: FIRST GUARANTY MORTGAGE CORP., et al., <sup>1</sup>  Debtors.	Chapter 11 Bankr. Case No. 22-10584 (CTG) (Jointly Administered)
LORI BUCKLEY, GAYLE ZECH, ROBERTA MARTINEZ, JENNIFER JACKSON and JAMESDAVIES, on behalf of themselves and all others similarly situated,  Plaintiffs,  v. FIRST GUARANTY MORTGAGE CORP., et al.  Defendants.	Adv. Pro. No. 22-50387-CTG

**ORDER APPROVING STIPULATION  
TO CERTIFY CLASS AND GRANTING RELATED RELIEF**

AND NOW, upon certification of counsel, and upon consideration of the Stipulation to Certify Class (the “Stipulation”, Exhibit “A” hereto); and upon finding that the Stipulation should be approved and that the proposed, stipulated class meets the requirements of Fed. R. Civ. P. 23(a) and (b) and Rule 23(b)(3), as made applicable by Fed. R. Bankr. P. 7023, it is hereby

ORDERED that the Stipulation is HEREBY APPROVED; and it is

FURTHER ORDERED that a class (the “Class”) is certified comprised of:

Those 425 employees of First Guaranty Mortgage Corporation (“FGMC”) specified by individual name and employee number on Schedule 1 to the Stipulation who reported to FGMC’s Plano, Texas facility and were involuntarily separated from employment on June 24, 2022, but excluding any such individuals who timely elect to opt out of the Class; and it is

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<sup>1</sup> The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor’s federal tax identification number, are: First Guaranty Mortgage Corporation (9575); and Maverick II Holdings, LLC (5621). The Debtors’ mailing address is 5400 Tennyson Parkway, Suite 450, Plano, TX 75024.

FURTHER ORDERED that Raisner Roupinian LLP, Lankenau & Miller LLP and The Gardner Firm, P.C. are hereby appointed Class counsel ("Class Counsel"); and it is

FURTHER ORDERED that Lori Buckley, Gayle Zech, Roberta Martinez, Jennifer Jackson, and James Davies are hereby appointed Class Representatives; and it is

FURTHER ORDERED that the proposed form of notice to the Class attached hereto as Exhibit "B" (the "Notice") is approved; and it is

FURTHER ORDERED that within ten (10) business days after the entry of this Order, FGMC shall provide Class Counsel with an electronic spreadsheet containing the names and last known addresses, as noted in FGMC's records, of the former employees reflected on Schedule 1 to the Joint Stipulation and encompassed by the Class as defined above; and it is

FURTHER ORDERED that on or before fifteen (15) business days after receipt from FGMC of the electronic spreadsheet containing the names and addresses of the Class members, Class Counsel, or their designee, shall provide notice of the pendency of the class action lawsuit by mailing the Notice via First Class postage prepaid, to all Class members at their last known addresses as noted in FGMC's records; and it is

FURTHER ORDERED that after such mailing, Class Counsel shall serve and file a sworn statement affirming compliance with this Order concerning the mailing of the Notice; and it is

FURTHER ORDERED that the deadline for any Class member to opt-out of the Class shall be 35 days from the date of mailing of the Notice; and it is

FURTHER ORDERED that after the opt-out deadline has expired, Class Counsel shall serve and file a sworn statement listing the names of any persons who have opted out of the Class; and it is

FURTHER ORDERED that Notice in compliance with this order is hereby found to be the best notice practicable under the circumstances and constitutes due and sufficient notice to all Class members in full compliance with the notice requirements of Fed. R. Civ. P. 23.

AND IT IS SO ORDERED.

Dated: January 11th, 2023  
Wilmington, Delaware

A handwritten signature in black ink, appearing to read "Craig Goldblatt", written in a cursive style.

CRAIG T. GOLDBLATT  
UNITED STATES BANKRUPTCY JUDGE